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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Case No. 1:22-cv-03131-DG-SJB

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SHERRY PRICE,
Plaintiff,

v.

BASDEO RAMPERSAD et al.,
Defendants.

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO SHOW CAUSE ORDER**

COMES NOW, Sherry Price (“the Plaintiff”), and files this, her Motion for an Extension of Time to file her ORDER TO SHOW CAUSE. Based on the facts set forth below, the Plaintiff respectfully moves this Court for the Entry of an Order for a twenty (20) day extension of time, from the date of Plaintiff’s order to show cause by date September 26, 2022.

I. INTRODUCTION AND BACKGROUND

1. On June 1, 2022, Plaintiff filed her Complaint.

2. On August 18, 2022, Defendant Basdeo Rampersad and Rajdaye Babwah filed a joint response Answer (“ANSWER”).

3. On September 12, 2022, Magistrate Judge Sanket J. Bulsara directed Plaintiff to respond with an Order to Show Cause for lack of subject matter jurisdiction.

4. On September 12, 2022, Plaintiff’s daughter underwent brain surgery and is in recovery. In light of complications resulting from surgery, Plaintiff’s daughter needs full-time care.

5. Plaintiff’s daughter who now requires twenty-four (24) hours of care and assistance, is solely cared for by the Plaintiff.

6. In addition to the above reasons Plaintiff requests additional time to file an Amended Complaint to address the Court’s concerns over a federal cause of action wherein Plaintiff will stipulate the specific statutory basis of action.

II. CONCLUSION


WHEREFORE, in view of the foregoing, the Plaintiff respectfully moves this Court for the entry of an order for a twenty (20) day extension of time, from the date she is expected to respond, to file her reply to Show Cause.

Dated: September 19, 2022.

Respectfully Submitted,

Sherry

Price

 Digitally signed by Sherry Price
Date: 2022.09.19 21:30:37 -04'00'

/s/ Sherry Price

Plaintiff

243-10 138th Ave

Rosedale

New York 11422

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all parties notice for service, under the exclusive care and custody of the United States Postal Service via Certified Mail within the State of New York upon:

Basdeo Rampersad
Rajdaye Babwah
% Robert G. Frank
98-20 Metropolitan Ave
Forest Hill
New York 11375

Executed on September 19, 2022.

By: **Sherry Price**
Sherry Price

Digitally signed by Sherry Price
Date: 2022.09.19 21:31:06 -04'00'